

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ASHLEY PIERRELOUIS, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOGO INC., MICHAEL J. SMALL,
OAKLEIGH THORNE, NORMAN
SMAGLEY, BARRY ROWAN, and JOHN
WADE,

Defendants.

Civil Action No. 18-cv-04473

Honorable Jorge L. Alonzo

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR: (I) PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT; (II) CERTIFICATION OF THE SETTLEMENT
CLASS; AND (III) APPROVAL OF NOTICE OF SETTLEMENT**

Court-appointed lead plaintiff Daniel Rogers hereby respectfully moves the Court for an Order: (i) preliminarily approving the proposed settlement with Defendants Gogo Inc., Michael J. Small, Oakleigh Thorne, Norman Smagley, Barry Rowan, and John Wade; (ii) certifying a settlement class; (iii) approving the form and method for giving notice to members of the settlement class as provided in the Stipulation and Agreement of Settlement dated April 12, 2022 (“Stipulation”); and (iv) scheduling a final approval hearing for a date at the Court’s convenience. Defendants do not oppose the relief requested by this motion.

This motion is based upon the present Motion, the Stipulation, the supporting Memorandum of Law, the Declaration of Casey E. Sadler, the [Proposed] Order submitted concurrently herewith, and all pleadings, records and papers on file herein.

Dated: April 14, 2022

Respectfully Submitted,

LUBIN AUSTERMUEHLE

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